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Proposed Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
)
) Chapter 11
AEGEAN MARINE PETROLEUM NETWORK)
INC.,) Case No. 18-13374 (_____
) Debtor.)
)
Tax I.D. No. N/A)
)
)
In re:)
) Chapter 11
AEGEAN BUNKERING (USA) LLC,)
) Case No. 18-13373 (_____
) Debtor.)
)
Tax I.D. No. 80-0961739)
)
)
In re:) Chapter 11
)
) Case No. 18-13375 (_____
AEGEAN (FUJAIRAH) BUNKERING S.A.,)
)
) Debtor.)
)
Tax I.D. No. N/A)
)
)

In re:) Chapter 11
AEGEAN ACE MARITIME COMPANY,) Case No. 18-13376 (_____
Debtor.)
Tax I.D. No. N/A)
In re:) Chapter 11
AEGEAN AGENCY (GIBRALTAR) LIMITED,) Case No. 18-13377 (_____
Debtor.)
Tax I.D. No. N/A)
In re:) Chapter 11
AEGEAN BREEZE MARITIME COMPANY,) Case No. 18-13378 (_____
Debtor.)
Tax I.D. No. N/A)
In re:) Chapter 11
AEGEAN BUNKERING (GIBRALTAR)) Case No. 18-13379 (_____
LIMITED,)
Debtor.)
Tax I.D. No. N/A)

In re:) Chapter 11
AEGEAN BUNKERING (HONG KONG)) Case No. 18-13381 (_____
LIMITED,)
Debtor.)
Tax I.D. No. N/A)

In re:)
) Chapter 11
 AEGEAN BUNKERING (JAMAICA) LTD.,)
) Case No. 18-13383 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING (SINGAPORE) PTE.)
 LTD.,) Case No. 18-13384 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING (TRINIDAD) LTD.,)
) Case No. 18-13386 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING COMBUSTIBLES)
 LAS PALMAS S.A.,) Case No. 18-13387 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING MOROCCO SARL AU,)
) Case No. 18-13389 (_____
 Debtor.)
)
Tax I.D. No. N/A)

)
In re:)
) Chapter 11
 AEGEAN BUNKERING SERVICES INC.,)
) Case No. 18-13391 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
 AEGEAN CARIBBEAN HOLDINGS INC.,)
) Case No. 18-13393 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
 AEGEAN GAS MARITIME COMPANY,)
) Case No. 18-13394 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
 AEGEAN HOLDINGS S.A.,)
) Case No. 18-13396 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
 AEGEAN INVESTMENTS S.A.,)
) Case No. 18-13397 (_____
 Debtor.)
)
Tax I.D. No. N/A)

In re:)
AEGEAN MAISTROS MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13398 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN MANAGEMENT SERVICES M.C.,) Chapter 11
Debtor.) Case No. 18-13399 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN MARINE PETROLEUM S.A.,) Chapter 11
Debtor.) Case No. 18-13400 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN OIL (USA), LLC,) Chapter 11
Debtor.) Case No. 18-13402 (_____

Tax I.D. No. 27-0122166)
In re:)
AEGEAN OIL TERMINAL CORPORATION,) Chapter 11
Debtor.) Case No. 18-13404 (_____

Tax I.D. No. N/A)

)
In re:)
) Chapter 11
AEGEAN PETROLEUM INTERNATIONAL)
INC.,) Case No. 18-13405 (_____
) Debtor.
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN SHIP III MARITIME COMPANY,)
) Case No. 18-13407 (_____
) Debtor.
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN SHIP VIII MARITIME COMPANY,)
) Case No. 18-13408 (_____
) Debtor.
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN SHIP XII MARITIME COMPANY,)
) Case No. 18-13410 (_____
) Debtor.
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN SHIPHOLDINGS INC.,)
) Case No. 18-13412 (_____
) Debtor.
)
Tax I.D. No. N/A)

In re:)
AEGEAN TANKFARMS HOLDINGS S.A.,) Chapter 11
Debtor.) Case No. 18-13413 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN TANKING S.A.,) Chapter 11
Debtor.) Case No. 18-13415 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN TIFFANY MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13416 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN VII SHIPPING LTD.,) Chapter 11
Debtor.) Case No. 18-13418 (_____

Tax I.D. No. N/A)
In re:)
AMORGOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13420 (_____

Tax I.D. No. N/A)

)
In re:)
AMPN USA, LLC,) Chapter 11
Debtor.) Case No. 18-13421 (_____
Tax I.D. No. 20-8050667)
)
In re:)
AMPNI HOLDINGS CO. LIMITED,) Chapter 11
Debtor.) Case No. 18-13423 (_____
Tax I.D. No. N/A)
)
In re:)
AMPNI INVESTMENTS CO. LIMITED,) Chapter 11
Debtor.) Case No. 18-13380 (_____
Tax I.D. No. N/A)
)
In re:)
ANDROS MARINE LIMITED,) Chapter 11
Debtor.) Case No. 18-13382 (_____
Tax I.D. No. N/A)
)
In re:)
BENMORE SERVICES S.A.,) Chapter 11
Debtor.) Case No. 18-13385 (_____
Tax I.D. No. N/A)

)
In re:)
CARIBBEAN RENEWABLE ENERGY) Chapter 11
SOURCES INC.,) Case No. 18-13388 (_____
Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
CEPHALLONIA MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13390 (_____
)
Tax I.D. No. N/A)
)
In re:)
DILOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13392 (_____
)
Tax I.D. No. N/A)
)
In re:)
ETON MARINE LTD.,) Chapter 11
Debtor.) Case No. 18-13395 (_____
)
Tax I.D. No. N/A)
)
In re:)
HALKI NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13401 (_____
)
Tax I.D. No. N/A)

)
In re:)
I.C.S. PETROLEUM (MONTREAL) LTD.,) Chapter 11
Debtor.) Case No. 18-13403 (_____

Tax I.D. No. N/A)
)
In re:)
I.C.S. PETROLEUM LTD.,) Chapter 11
Debtor.) Case No. 18-13406 (_____

Tax I.D. No. N/A)
)
In re:)
INGRAM ENTERPRISES CO.,) Chapter 11
Debtor.) Case No. 18-13409 (_____

Tax I.D. No. N/A)
)
In re:)
IOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13411 (_____

Tax I.D. No. N/A)
)
In re:)
IOS SHIPPING LTD,) Chapter 11
Debtor.) Case No. 18-13414 (_____

Tax I.D. No. N/A)

)
In re:)
ITHAKI MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13417 (_____
)
Tax I.D. No. N/A)
)
In re:)
KASSOS NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13419 (_____
)
Tax I.D. No. N/A)
)
In re:)
KERKYRA MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13422 (_____
)
Tax I.D. No. N/A)
)
In re:)
KIMOLOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13424 (_____
)
Tax I.D. No. N/A)
)
In re:)
KITHNOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13425 (_____
)
Tax I.D. No. N/A)

)
In re:)
KYTHIRA MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13426 (_____
)
Tax I.D. No. N/A)
)
In re:)
LEFKAS MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13427 (_____
)
Tax I.D. No. N/A)
)
In re:)
MAISTROS RORO SHIPHOLDINGS LTD.,) Chapter 11
Debtor.) Case No. 18-13428 (_____
)
Tax I.D. No. N/A)
)
In re:)
MILOS SHIPPING (PTE.) LTD.,) Chapter 11
Debtor.) Case No. 18-13429 (_____
)
Tax I.D. No. N/A)
)
In re:)
MYKONOS I MARITIME LIMITED,) Chapter 11
Debtor.) Case No. 18-13430 (_____
)
Tax I.D. No. N/A)

In re:)
NEVADO NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13431 (_____
Tax I.D. No. N/A)

In re:)
OSTRIA RORO SHIPHOLDINGS LTD,) Chapter 11
Debtor.) Case No. 18-13432 (_____
Tax I.D. No. N/A)

In re:)
PAROS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13433 (_____
Tax I.D. No. N/A)

In re:)
PAXOI MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13434 (_____
Tax I.D. No. N/A)

In re:)
SANTON LIMITED,) Chapter 11
Debtor.) Case No. 18-13435 (_____
Tax I.D. No. N/A)

In re:)
SANTORINI I MARITIME LIMITED,) Chapter 11
Debtor.) Case No. 18-13436 (_____
Tax I.D. No. N/A)
In re:)
SEALAND NAVIGATION INC.,) Chapter 11
Debtor.) Case No. 18-13437 (_____
Tax I.D. No. N/A)
In re:)
SERIFOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13438 (_____
Tax I.D. No. N/A)
In re:)
SERIFOS SHIPPING (PTE.) LTD.,) Chapter 11
Debtor.) Case No. 18-13439 (_____
Tax I.D. No. N/A)
In re:)
SIFNOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13440 (_____
Tax I.D. No. N/A)

In re:)
SYMI NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13441 (_____
Tax I.D. No. N/A)

In re:)
TASMAN SEAWAYS INC.,) Chapter 11
Debtor.) Case No. 18-13442 (_____
Tax I.D. No. N/A)

In re:)
TEMPEST SHIPTRADE LTD,) Chapter 11
Debtor.) Case No. 18-13443 (_____
Tax I.D. No. N/A)

In re:)
TILOS SHIPPING (PTE.) LTD.,) Chapter 11
Debtor.) Case No. 18-13444 (_____
Tax I.D. No. N/A)

In re:)
TINOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13445 (_____
Tax I.D. No. N/A)

In re:)
WEST COAST FUEL TRANSPORT LTD.,) Chapter 11
Debtor.) Case No. 18-13446 (_____
Tax I.D. No. N/A)
In re:)
ZAKYNTHOS MARINE LIMITED,) Chapter 11
Debtor.) Case No. 18-13447 (_____
Tax I.D. No. N/A)

**DEBTORS' MOTION SEEKING ENTRY
OF AN ORDER (I) DIRECTING JOINT ADMINISTRATION
OF THE CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully state as follows in support of this motion (this “Motion”):¹

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), (a) directing procedural consolidation and joint administration of these chapter 11 cases, and (b) granting related relief. Specifically, the Debtors request that the United States Bankruptcy Court for the Southern District of New York (the “Court”) maintain one file and one docket for all of the jointly administered cases under the case of Aegean Marine Petroleum Network Inc., and that the cases be administered under a consolidated caption, as follows:

¹ The facts and circumstances supporting this Motion are set forth in the *Declaration of Tyler Baron, Director of Aegean Marine Petroleum Network Inc., in Support of the Chapter 11 Petitions and First Day Motions* (the “Baron First Day Declaration”), and the *Declaration of Andrew Hede, Restructuring Advisor to Aegean Marine Petroleum Network Inc., in Support of the Chapter 11 Petitions and First Day Motions* (the “Hede First Day Declaration”), filed contemporaneously herewith and incorporated by reference herein (collectively, the “First Day Declarations”).

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)) Chapter 11
))
AEGEAN MARINE PETROLEUM NETWORK)) Case No. 18-13374 (____)
INC., <i>et al.</i> ¹))
))
Debtors.)	(Jointly Administered)
))

2. The Debtors further request that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket of each of the Debtors other than Aegean Marine Petroleum Network Inc. to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York directing joint administration of the chapter 11 cases of: Aegean Marine Petroleum Network Inc., Case No. 18-13374; Aegean Bunkering (USA) LLC, Case No. 18-13373; Aegean (Fujairah) Bunkering S.A., Case No. 18-13375; Aegean Ace Maritime Company, Case No. 18-13376; Aegean Agency (Gibraltar) Limited, Case No. 18-13377; Aegean Breeze Maritime Company, Case No. 18-13378; Aegean Bunkering (Gibraltar) Limited, Case No. 18-13379; Aegean Bunkering (Hong Kong) Limited, Case No. 18-13381; Aegean Bunkering (Jamaica) Limited, Case No. 18-13383; Aegean Bunkering (Singapore) Pte. Ltd., Case No. 18-13384; Aegean Bunkering (Trinidad) Ltd., Case No. 18-13386; Aegean Bunkering Combustibles Las Palmas S.A., Case No. 18-13387; Aegean Bunkering Morocco SARL AU, Case No. 18-13389; Aegean Bunkering Services Inc., Case No. 18-13391; Aegean Caribbean Holdings Inc., Case No. 18-13393; Aegean Gas Maritime Company, Case No. 18-13394; Aegean Holdings S.A., Case No. 18-13396; Aegean Investments S.A., Case No. 18-13397; Aegean Maistros Maritime Company, Case No. 18-13398; Aegean Management Services M.C., Case No. 18-

¹ Due to the large number of Debtors in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their tax identification, registration, or like numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://dm.epiq11.com/aegean>. The location of Debtor Aegean Bunkering (USA) LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 52 Vanderbilt Avenue, Suite 1405, New York, New York 10017.

13399; Aegean Marine Petroleum S.A., Case No. 18-13400; Aegean Oil Terminal Corporation, Case No. 18-13404; Aegean Oil (USA), LLC, Case No. 18-13402; Aegean Petroleum International Inc., Case No. 18-13405; Aegean Ship III Maritime Company, Case No. 18-13407; Aegean Ship VIII Maritime Company, Case No. 18-13408; Aegean Ship XII Maritime Company, Case No. 18-13410; Aegean Shipholdings Inc., Case No. 18-13412; Aegean Tankfarms Holdings S.A., Case No. 18-13413; Aegean Tanking S.A., Case No. 18-13415; Aegean Tiffany Maritime Company, Case No. 18-13416; Aegean VII Shipping Ltd., Case No. 18-13418; Amorgos Maritime Inc., Case No. 18-13420; AMPN USA, LLC, Case No. 18-13421; AMPNI Holdings Co. Limited, Case No. 18-13423; AMPNI Investments Co. Limited, Case No. 18-13380; Andros Marine Limited, Case No. 18-13382; Benmore Services S.A., Case No. 18-13385; Caribbean Renewable Energy Sources Inc., Case No. 18-13388; Cephallonia Marine S.A., Case No. 18-13390; Dilos Marine Inc., Case No. 18-13392; Eton Marine Ltd., Case No. 18-13395; Halki Navigation S.A., Case No. 18-13401; I.C.S. Petroleum (Montreal) Ltd., Case No. 18-13403; I.C.S. Petroleum Ltd., Case No. 18-13406; Ingram Enterprises Co., Case No. 18-13409; Ios Marine Inc., Case No. 18-13411; Ios Shipping Ltd, Case No. 18-13414; Ithaki Marine S.A., Case No. 18-13417; Kassos Navigation S.A., Case No. 18-13419; Kerkyra Marine S.A., Case No. 18-13422; Kimolos Maritime Inc., Case No. 18-13424; Kithnos Maritime Inc., Case No. 18-13425; Kythira Marine S.A., Case No. 18-13426; Lefkas Marine S.A., Case No. 18-13427; Maistros Roro Shipholdings Ltd., Case No. 18-13428; Milos Shipping (Pte.) Ltd., Case No. 18-13429; Mykonos I Maritime Limited, Case No. 18-13430; Nevado Navigation S.A., Case No. 18-13431; Ostria Roro Shipholdings Ltd., Case No. 18-13432; Paros Maritime Inc., Case No. 18-13433; Paxoi Marine S.A., Case No. 18-13434; Santon Limited, Case No. 18-13435; Santorini I Maritime Limited, Case No. 18-13436; Sealand Navigation Inc., Case No. 18-13437; Serifos Maritime Inc., Case No. 18-13438; Serifos Shipping (Pte.) Ltd., Case No. 18-13439; Sifnos Marine Inc., Case No. 18-13440; Symi Navigation S.A., Case No. 18-13441; Tasman Seaways Inc., Case No. 18-13442; Tempest Shiptrade Ltd, Case No. 18-13443; Tilos Shipping (Pte.) Ltd., Case No. 18-13444; Tinos Marine Inc., Case No. 18-13445; West Coast Fuel Transport Ltd., Case No. 18-13446; Zakynthos Marine Limited, Case No. 18-13447. **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 18-13374 (____).**

Jurisdiction and Venue

3. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012. The Debtors confirm their consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), to the entry of a final order by the Court in connection with this Motion to the extent that it is later

determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are sections 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Bankruptcy Rules 1015(b) and 6003, and rule 9013-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”).

Background

6. Aegean Marine Petroleum Network Inc., together with its Debtor and non-Debtor subsidiaries, is a leading marine fuel logistics company with approximately 850 employees and active operations in 20 countries worldwide. The Debtors’ core business involves marketing and physically supplying marine fuel and lubricants to vessels in port, at sea, on rivers and other waterways. The Debtors own and/or operate a fleet of 57 vessels, including 37 owned double hull bunkering tankers, covering more than 50 ports worldwide, including Northern Europe and the Antwerp-Rotterdam-Amsterdam-region, the U.S. East and West Coasts, Gibraltar, Greece, Morocco, Canada, Jamaica, Trinidad and Tobago, the Gulf of Mexico, Germany, South Africa, and the U.S. Virgin Islands. The Debtors also own or lease land-based storage facilities—consisting of two terminals and more than 1,000,000 cubic meters of storage capacity—in the United States, Morocco, Canary Islands, Germany, and the United Arab Emirates. The Debtors are headquartered in Athens, Greece, and have a corporate office in New York, New York. As of the date hereof (the “Petition Date”), the Debtors’ funded debt obligations totaled approximately \$855 million consisting of 12 secured credit facilities and two issuances of unsecured convertible notes.

7. On the Petition Date, each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases, and no committees have been appointed or designated.

Basis for Relief

8. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” The Debtor entities that commenced chapter 11 cases are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court with authority to grant the relief requested herein.

9. Section 105(a) of the Bankruptcy Code provides the Bankruptcy Court with the power to grant the relief requested herein by permitting the Bankruptcy Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code].”

10. Joint administration is generally non-controversial, and courts in this jurisdiction routinely order joint administration in cases with multiple, related debtors. *See, e.g., In re Nine West Holdings, Inc.*, No. 18-10947 (SCC) (Bankr. S.D.N.Y. Apr. 19, 2018); *In re Cenveo, Inc.*, Case No. 18-22178 (RDD) (Bankr. S.D.N.Y. Feb. 5, 2018); *In re Glob. A&T Elecs. Ltd.*, Case No. 17-23931 (RDD) (Bankr. S.D.N.Y. Dec. 19, 2017); *In re 21st Century Oncology Holdings*,

Inc., Case No. 17-22770 (RDD) (Bankr. S.D.N.Y. May 26, 2017); *In re BCBG Max Azria Glob. Holdings, LLC*, Case No. 17-10466 (SCC) (Bankr. S.D.N.Y. Mar. 2, 2017).³

11. Joint administration of these chapter 11 cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these chapter 11 cases will affect each Debtor entity. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration also will allow the Office of the United States Trustee for the Southern District of New York and all parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

12. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because this Motion seeks only administrative, not substantive, consolidation of the Debtors' estates. Parties in interest will not be harmed by the relief requested, but instead will benefit from the cost reductions associated with the joint administration of these chapter 11 cases. Accordingly, the Debtors submit that the joint administration of these chapter 11 cases is in the best interests of their estates, their creditors, and all other parties in interest.

Motion Practice

13. This Motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their application to this Motion. Accordingly, the Debtors submit that this Motion satisfies Local Rule 9013-1(a).

³ Because of the voluminous nature of the orders cited herein, such orders have not been attached to this Motion. Copies of these orders are available upon request to the Debtors' proposed counsel.

Notice

14. Notice of the hearing on the relief requested in the Motion has been provided by the Debtors in accordance and compliance with Bankruptcy Rules 4001 and 9014, as well as the Local Rules, and is sufficient under the circumstances. Without limiting the forgoing, due notice was afforded, whether by facsimile, electronic mail, overnight courier or hand delivery, to parties-in-interest, including (a) the Office of the United States Trustee for the Southern District of New York; (b) entities listed as holding the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) the agents for each of the Debtors' secured credit facilities; (d) the indenture trustee for each of the Debtors' unsecured notes; (e) counsel to the ad hoc group of unsecured noteholders; (f) counsel to the Stalking Horse Bidder; (g) counsel to the agent under the Debtors' debtor-in-possession financing facility; (h) counsel to the parties (if known) referenced in clauses (c) and (d); (i) the Office of the United States Attorney for the Southern District of New York; (j) the state attorneys general for states in which the Debtors conduct business; (k) the Internal Revenue Service; (l) the Securities and Exchange Commission; (m) the Environmental Protection Agency and similar state environmental agencies for states in which the Debtors conduct business; and (n) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

15. No prior request for the relief sought in this Motion has been made to this or any other court.

[Remainder of page intentionally left blank.]

WHEREFORE, the Debtors respectfully request that the Court enter the Order, substantially in the form attached hereto as Exhibit A, granting the relief requested in this Motion and granting such other and further relief as is appropriate under the circumstances.

New York, New York

Dated: November 6, 2018

/s/ Jonathan S. Henes P.C.

Marc Kieselstein, P.C.

Jonathan S. Henes, P.C.

Cristine Pirro Schwarzman

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- and -

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Ross M. Kwasteniet, P.C. (*pro hac vice* pending)

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
)
) Chapter 11
AEGEAN MARINE PETROLEUM NETWORK)
INC.,) Case No. 18-13374 (_____
) Debtor.
)
Tax I.D. No. N/A)
)
)
In re:)
) Chapter 11
AEGEAN BUNKERING (USA) LLC,)
) Case No. 18-13373 (_____
) Debtor.
)
Tax I.D. No. 80-0961739)
)
)
In re:) Chapter 11
)
) Case No. 18-13375 (_____
AEGEAN (FUJAIRAH) BUNKERING S.A.,)
)
) Debtor.
)
Tax I.D. No. N/A)
)
)
In re:) Chapter 11
)
) Case No. 18-13376 (_____
AEGEAN ACE MARITIME COMPANY,)
)
) Debtor.
)
Tax I.D. No. N/A)
)
)
In re:) Chapter 11
)
) Case No. 18-13377 (_____
AEGEAN AGENCY (GIBRALTAR) LIMITED,)
)
) Debtor.
)
Tax I.D. No. N/A)

In re:)
AEGEAN BREEZE MARITIME COMPANY,) Chapter 11
Debtor.)
Tax I.D. No. N/A) Case No. 18-13378 (_____

In re:) Chapter 11
AEGEAN BUNKERING (GIBRALTAR))
LIMITED,) Case No. 18-13379 (_____
Debtor.)
Tax I.D. No. N/A)

In re:) Chapter 11
AEGEAN BUNKERING (HONG KONG))
LIMITED,) Case No. 18-13381 (_____
Debtor.)
Tax I.D. No. N/A)

In re:)
) Chapter 11
 AEGEAN BUNKERING (JAMAICA) LTD.,)
) Case No. 18-13383 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING (SINGAPORE) PTE.)
 LTD.,) Case No. 18-13384 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING (TRINIDAD) LTD.,)
) Case No. 18-13386 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING COMBUSTIBLES)
 LAS PALMAS S.A.,) Case No. 18-13387 (_____
 Debtor.)
)
Tax I.D. No. N/A)
)
 In re:)
) Chapter 11
 AEGEAN BUNKERING MOROCCO SARL AU,)
) Case No. 18-13389 (_____
 Debtor.)
)
Tax I.D. No. N/A)

)
In re:)
) Chapter 11
AEGEAN BUNKERING SERVICES INC.,)
) Case No. 18-13391 (_____
Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN CARIBBEAN HOLDINGS INC.,)
) Case No. 18-13393 (_____
Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN GAS MARITIME COMPANY,)
) Case No. 18-13394 (_____
Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN HOLDINGS S.A.,)
) Case No. 18-13396 (_____
Debtor.)
)
Tax I.D. No. N/A)
)
In re:)
) Chapter 11
AEGEAN INVESTMENTS S.A.,)
) Case No. 18-13397 (_____
Debtor.)
)
Tax I.D. No. N/A)

In re:)
AEGEAN MAISTROS MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13398 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN MANAGEMENT SERVICES M.C.,) Chapter 11
Debtor.) Case No. 18-13399 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN MARINE PETROLEUM S.A.,) Chapter 11
Debtor.) Case No. 18-13400 (_____

Tax I.D. No. N/A)
In re:)
AEGEAN OIL (USA), LLC,) Chapter 11
Debtor.) Case No. 18-13402 (_____

Tax I.D. No. 27-0122166)
In re:)
AEGEAN OIL TERMINAL CORPORATION,) Chapter 11
Debtor.) Case No. 18-13404 (_____

Tax I.D. No. N/A)

In re:)
AEGEAN PETROLEUM INTERNATIONAL) Chapter 11
INC.,) Case No. 18-13405 (_____
Debtor.)
Tax I.D. No. N/A)
In re:)
AEGEAN SHIP III MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13407 (_____
Tax I.D. No. N/A)
In re:)
AEGEAN SHIP VIII MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13408 (_____
Tax I.D. No. N/A)
In re:)
AEGEAN SHIP XII MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13410 (_____
Tax I.D. No. N/A)
In re:)
AEGEAN SHIPHOLDINGS INC.,) Chapter 11
Debtor.) Case No. 18-13412 (_____
Tax I.D. No. N/A)

In re:)
AEGEAN TANKFARMS HOLDINGS S.A.,) Chapter 11
Debtor.) Case No. 18-13413 (_____
Tax I.D. No. N/A)
)
In re:)
AEGEAN TANKING S.A.,) Chapter 11
Debtor.) Case No. 18-13415 (_____
Tax I.D. No. N/A)
)
In re:)
AEGEAN TIFFANY MARITIME COMPANY,) Chapter 11
Debtor.) Case No. 18-13416 (_____
Tax I.D. No. N/A)
)
In re:)
AEGEAN VII SHIPPING LTD.,) Chapter 11
Debtor.) Case No. 18-13418 (_____
Tax I.D. No. N/A)
)
In re:)
AMORGOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13420 (_____
Tax I.D. No. N/A)
)

)
In re:)
AMPN USA, LLC,) Chapter 11
Debtor.) Case No. 18-13421 (_____
Tax I.D. No. 20-8050667)
)
In re:)
AMPNI HOLDINGS CO. LIMITED,) Chapter 11
Debtor.) Case No. 18-13423 (_____
Tax I.D. No. N/A)
)
In re:)
AMPNI INVESTMENTS CO. LIMITED,) Chapter 11
Debtor.) Case No. 18-13380 (_____
Tax I.D. No. N/A)
)
In re:)
ANDROS MARINE LIMITED,) Chapter 11
Debtor.) Case No. 18-13382 (_____
Tax I.D. No. N/A)
)
In re:)
BENMORE SERVICES S.A.,) Chapter 11
Debtor.) Case No. 18-13385 (_____
Tax I.D. No. N/A)

In re:)
CARIBBEAN RENEWABLE ENERGY) Chapter 11
SOURCES INC.,) Case No. 18-13388 (_____
Debtor.)
Tax I.D. No. N/A)
In re:)
CEPHALLONIA MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13390 (_____
Tax I.D. No. N/A)
In re:)
DILOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13392 (_____
Tax I.D. No. N/A)
In re:)
ETON MARINE LTD.,) Chapter 11
Debtor.) Case No. 18-13395 (_____
Tax I.D. No. N/A)
In re:)
HALKI NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13401 (_____
Tax I.D. No. N/A)

)
In re:)
I.C.S. PETROLEUM (MONTREAL) LTD.,) Chapter 11
Debtor.) Case No. 18-13403 (_____

Tax I.D. No. N/A)
)
In re:)
I.C.S. PETROLEUM LTD.,) Chapter 11
Debtor.) Case No. 18-13406 (_____

Tax I.D. No. N/A)
)
In re:)
INGRAM ENTERPRISES CO.,) Chapter 11
Debtor.) Case No. 18-13409 (_____

Tax I.D. No. N/A)
)
In re:)
IOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13411 (_____

Tax I.D. No. N/A)
)
In re:)
IOS SHIPPING LTD,) Chapter 11
Debtor.) Case No. 18-13414 (_____

Tax I.D. No. N/A)

)
In re:)
ITHAKI MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13417 (_____
)
Tax I.D. No. N/A)
)
In re:)
KASSOS NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13419 (_____
)
Tax I.D. No. N/A)
)
In re:)
KERKYRA MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13422 (_____
)
Tax I.D. No. N/A)
)
In re:)
KIMOLOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13424 (_____
)
Tax I.D. No. N/A)
)
In re:)
KITHNOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13425 (_____
)
Tax I.D. No. N/A)

)
In re:)
KYTHIRA MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13426 (_____
)
Tax I.D. No. N/A)
)
In re:)
LEFKAS MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13427 (_____
)
Tax I.D. No. N/A)
)
In re:)
MAISTROS RORO SHIPHOLDINGS LTD.,) Chapter 11
Debtor.) Case No. 18-13428 (_____
)
Tax I.D. No. N/A)
)
In re:)
MILOS SHIPPING (PTE.) LTD.,) Chapter 11
Debtor.) Case No. 18-13429 (_____
)
Tax I.D. No. N/A)
)
In re:)
MYKONOS I MARITIME LIMITED,) Chapter 11
Debtor.) Case No. 18-13430 (_____
)
Tax I.D. No. N/A)

In re:)
NEVADO NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13431 (_____
Tax I.D. No. N/A)

In re:)
OSTRIA RORO SHIPHOLDINGS LTD,) Chapter 11
Debtor.) Case No. 18-13432 (_____
Tax I.D. No. N/A)

In re:)
PAROS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13433 (_____
Tax I.D. No. N/A)

In re:)
PAXOI MARINE S.A.,) Chapter 11
Debtor.) Case No. 18-13434 (_____
Tax I.D. No. N/A)

In re:)
SANTON LIMITED,) Chapter 11
Debtor.) Case No. 18-13435 (_____
Tax I.D. No. N/A)

In re:)
SANTORINI I MARITIME LIMITED,) Chapter 11
Debtor.) Case No. 18-13436 (_____
Tax I.D. No. N/A)
In re:)
SEALAND NAVIGATION INC.,) Chapter 11
Debtor.) Case No. 18-13437 (_____
Tax I.D. No. N/A)
In re:)
SERIFOS MARITIME INC.,) Chapter 11
Debtor.) Case No. 18-13438 (_____
Tax I.D. No. N/A)
In re:)
SERIFOS SHIPPING (PTE.) LTD.,) Chapter 11
Debtor.) Case No. 18-13439 (_____
Tax I.D. No. N/A)
In re:)
SIFNOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13440 (_____
Tax I.D. No. N/A)

In re:)
SYMI NAVIGATION S.A.,) Chapter 11
Debtor.) Case No. 18-13441 (_____
Tax I.D. No. N/A)

In re:)
TASMAN SEAWAYS INC.,) Chapter 11
Debtor.) Case No. 18-13442 (_____
Tax I.D. No. N/A)

In re:)
TEMPEST SHIPTRADE LTD,) Chapter 11
Debtor.) Case No. 18-13443 (_____
Tax I.D. No. N/A)

In re:)
TILOS SHIPPING (PTE.) LTD.,) Chapter 11
Debtor.) Case No. 18-13444 (_____
Tax I.D. No. N/A)

In re:)
TINOS MARINE INC.,) Chapter 11
Debtor.) Case No. 18-13445 (_____
Tax I.D. No. N/A)

In re:)
WEST COAST FUEL TRANSPORT LTD.,) Chapter 11
Debtor.) Case No. 18-13446 (_____
Tax I.D. No. N/A)
In re:)
ZAKYNTHOS MARINE LIMITED,) Chapter 11
Debtor.) Case No. 18-13447 (_____
Tax I.D. No. N/A)

**ORDER (I) DIRECTING JOINT ADMINISTRATION
OF THE CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)¹ of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”) (a) directing the joint administration of the Debtors’ chapter 11 cases for procedural purposes only and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declarations; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the motion.

circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The above-captioned chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered by this Court under Case No. 18-13374 (____).
3. The caption of the jointly administered cases should read as follows:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)) Chapter 11
))
AEGEAN MARINE PETROLEUM NETWORK)) Case No. 18-13374 (____)
INC., et al. ¹))
))
Debtors.)	(Jointly Administered)
))

4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

¹ Due to the large number of Debtors in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their tax identification, registration, or like numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://dm.epiq11.com/aegean>. The location of Debtor Aegean Bunkering (USA) LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 52 Vanderbilt Avenue, Suite 1405, New York, New York 10017.

5. A docket entry, substantially similar to the following, shall be entered on the docket of each of the Debtors other than Aegean Marine Petroleum Network Inc. to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York directing joint administration of the chapter 11 cases of: Aegean Marine Petroleum Network Inc., Case No. 18-13374; Aegean Bunkering (USA) LLC, Case No. 18-13373; Aegean (Fujairah) Bunkering S.A., Case No. 18-13375; Aegean Ace Maritime Company, Case No. 18-13376; Aegean Agency (Gibraltar) Limited, Case No. 18-13377; Aegean Breeze Maritime Company, Case No. 18-13378; Aegean Bunkering (Gibraltar) Limited, Case No. 18-13379; Aegean Bunkering (Hong Kong) Limited, Case No. 18-13381; Aegean Bunkering (Jamaica) Limited, Case No. 18-13383; Aegean Bunkering (Singapore) Pte. Ltd., Case No. 18-13384; Aegean Bunkering (Trinidad) Ltd., Case No. 18-13386; Aegean Bunkering Combustibles Las Palmas S.A., Case No. 18-13387; Aegean Bunkering Morocco SARL AU, Case No. 18-13389; Aegean Bunkering Services Inc., Case No. 18-13391; Aegean Caribbean Holdings Inc., Case No. 18-13393; Aegean Gas Maritime Company, Case No. 18-13394; Aegean Holdings S.A., Case No. 18-13396; Aegean Investments S.A., Case No. 18-13397; Aegean Maistros Maritime Company, Case No. 18-13398; Aegean Management Services M.C., Case No. 18-13399; Aegean Marine Petroleum S.A., Case No. 18-13400; Aegean Oil Terminal Corporation, Case No. 18-13404; Aegean Oil (USA), LLC, Case No. 18-13402; Aegean Petroleum International Inc., Case No. 18-13405; Aegean Ship III Maritime Company, Case No. 18-13407; Aegean Ship VIII Maritime Company, Case No. 18-13408; Aegean Ship XII Maritime Company, Case No. 18-13410; Aegean Shipholdings Inc., Case No. 18-13412; Aegean Tankfarms Holdings S.A., Case No. 18-13413; Aegean Tanking S.A., Case No. 18-13415; Aegean Tiffany Maritime Company, Case No. 18-13416; Aegean VII Shipping Ltd., Case No. 18-13418; Amorgos Maritime Inc., Case No. 18-13420; AMPN USA, LLC, Case No. 18-13421; AMPNI Holdings Co. Limited, Case No. 18-13423; AMPNI Investments Co. Limited, Case No. 18-13380; Andros Marine Limited, Case No. 18-13382; Benmore Services S.A., Case No. 18-13385; Caribbean Renewable Energy Sources Inc., Case No. 18-13388; Cephallonia Marine S.A., Case No. 18-13390; Dilos Marine Inc., Case No. 18-13392; Eton Marine Ltd., Case No. 18-13395; Halki Navigation S.A., Case No. 18-13401; I.C.S. Petroleum (Montreal) Ltd., Case No. 18-13403; I.C.S. Petroleum Ltd., Case No. 18-13406; Ingram Enterprises Co., Case No. 18-13409; Ios Marine Inc., Case No. 18-13411; Ios Shipping Ltd, Case No. 18-13414; Ithaki Marine S.A., Case No. 18-13417; Kassos Navigation S.A., Case No. 18-13419; Kerkyra Marine S.A., Case No. 18-13422; Kimolos Maritime Inc., Case No. 18-13424; Kithnos Maritime Inc., Case No. 18-13425; Kythira Marine S.A., Case No. 18-13426; Lefkas Marine S.A., Case No. 18-13427; Maistros Roro Shipholdings Ltd., Case No. 18-13428; Milos

Shipping (Pte.) Ltd., Case No. 18-13429; Mykonos I Maritime Limited, Case No. 18-13430; Nevado Navigation S.A., Case No. 18-13431; Ostria Roro Shipholdings Ltd., Case No. 18-13432; Paros Maritime Inc., Case No. 18-13433; Paxoi Marine S.A., Case No. 18-13434; Santon Limited, Case No. 18-13435; Santorini I Maritime Limited, Case No. 18-13436; Sealand Navigation Inc., Case No. 18-13437; Serifos Maritime Inc., Case No. 18-13438; Serifos Shipping (Pte.) Ltd., Case No. 18-13439; Sifnos Marine Inc., Case No. 18-13440; Symi Navigation S.A., Case No. 18-13441; Tasman Seaways Inc., Case No. 18-13442; Tempest Shiptrade Ltd, Case No. 18-13443; Tilos Shipping (Pte.) Ltd., Case No. 18-13444; Tinos Marine Inc., Case No. 18-13445; West Coast Fuel Transport Ltd., Case No. 18-13446; Zakynthos Marine Limited, Case No. 18-13447. **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 18-13374 (____).**

6. One consolidated docket, one file, and one consolidated service list shall be maintained by the Debtors and kept by the Clerk of the Bankruptcy Court with the assistance of the notice and claims agent retained by the Debtors in these chapter 11 cases.

7. The Debtors may file their monthly operating reports required by the *Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees*, issued by the U.S. Trustee, by consolidating the information required for each debtor in one report that tracks and breaks out all of the specific information (e.g., receipts, disbursements, etc.) on a debtor-by-debtor basis in each monthly operating report.

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these chapter 11 cases and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.

9. This Order shall apply to any future filing of any affiliate of the Debtors, *provided however*, the Debtors shall file notice with the Court identifying the cases of such affiliates and stating that this Order shall apply to such cases.

10. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

11. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

12. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

13. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

New York, New York
Dated: _____, 2018

UNITED STATES BANKRUPTCY JUDGE